



BellSouth Telecommunications, Inc.
333 Commerce Street, Suite 2101
Nashville, TN 37201-3300

guy.hicks@bellsouth.com

REGULATORY
OCT 01 00T 2 00 10 50

October 2, 2001

EXECUTIVE SECRETARY

Guy M. Hicks
General Counsel

615 214 6301
Fax 615 214 7406

VIA HAND DELIVERY

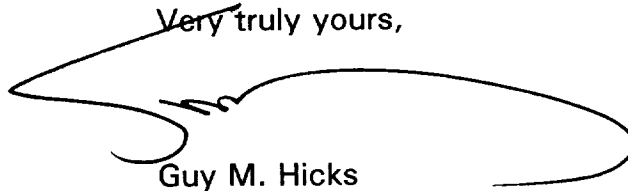
David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238

Re: *BellSouth Telecommunications, Inc.'s Entry Into Long Distance
(InterLATA) Service in Tennessee Pursuant to Section 271 of
the Telecommunications Act of 1996*
Docket No. 97-00309

Dear Mr. Waddell:

Enclosed are the original and thirteen copies of BellSouth's Reply to Response to Motion to Amend Schedule. Copies of the enclosed are being provided to counsel of record.

Very truly yours,



Guy M. Hicks

GMH:ch
Enclosure

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

In Re: *Consideration of the Provision of In-Region InterLATA Services By
BellSouth Telecommunications, Inc. Pursuant to Section 271 of the
Telecommunications Act of 1996*

Docket No. 97-00309

**BELLSOUTH'S REPLY TO RESPONSE
TO MOTION TO AMEND PROCEDURAL SCHEDULE**

BellSouth Telecommunications, Inc. ("BellSouth") hereby files its Reply to the Intervenor's Response to BellSouth's Motion to Amend the Procedural Schedule and states as follows:

DISCUSSION

BellSouth files this Reply to correct the numerous inaccuracies in the Intervenor's Response and to rebut the Intervenor's unsubstantiated allegations of misrepresentations by BellSouth. Irrespective of the merits (or the lack thereof) of the Intervenor's Response, BellSouth strongly objects to the Intervenor's characterization of BellSouth's position, and the Intervenor's implication that BellSouth has been anything but forthright and straightforward with the Authority.

First, the Intervenor erroneously contend that BellSouth "proposes to postpone all hearings on the application until after the completion of the agency's OSS and Performance Measures dockets." (Response, at 1). With respect to the performance measures docket, BellSouth has never proposed that the TRA wait on

the completion of the performance measures docket to review the Section 271 application. To the contrary, BellSouth has told the TRA on numerous occasions that it will ask the TRA to rely on a set of interim performance measures, adopted in Georgia, to make its assessment of BellSouth's compliance with the checklist. Thus, it is not necessary to wait for the completion of the performance measurements docket.

With respect to the OSS docket, BellSouth has not changed its position. BellSouth still contends that it is important to move forward on its 271 application. Given the schedule in the OSS case, however, and BellSouth's limited regulatory resources, it simply makes no sense at this juncture to hold the 271 proceeding until February 2002. February hearings will keep the 271 and OSS proceedings in parallel and will place these proceedings in the same scheduling posture that was originally anticipated by BellSouth when it filed its 271 case.

The Intervenor next erroneously contend that BellSouth's representation that its filing is incomplete is incorrect. To the contrary, BellSouth's Section 271 filing with the Authority is complete, and will remain complete in February. The fact that BellSouth will provide the TRA with additional, updated performance data and competitive data in no way impacts the completeness of the current filing. BellSouth always expected that the Authority would want current data, especially performance data. The fact that BellSouth will continue to provide updated performance data in no way impacts the validity of the current filing, despite the Intervenor's contentions otherwise. Indeed, the Authority should have the benefit

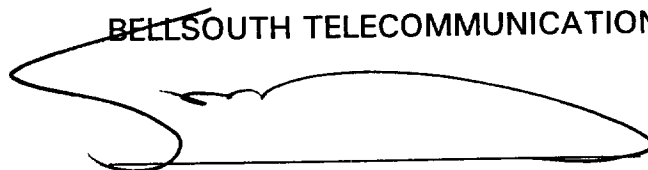
of updated competitive and performance data – data the FCC will review when BellSouth files its 271 case at the FCC.

Finally, the Intervenors contend that the application will need to be “substantially amended” due to the OSS docket. Again, BellSouth disagrees. BellSouth’s position has not changed: BellSouth contends that its OSS provide nondiscriminatory access to CLECs today and are compliant with Section 271 requirements today. Consequently, BellSouth does not believe it will need to amend its case to prove checklist compliance to the Authority.¹

For these reasons, BellSouth respectfully requests that the Authority deny the Intervenors’ request to dismiss BellSouth’s 271 application, and grant BellSouth’s request to consolidate the 271 proceedings into one hearing and defer the hearing until the week of February 18, 2002. Dismissing the Application is not appropriate for the reasons set forth herein. It is appropriate, however, to defer the hearing until a later date.

Respectfully submitted,

BELLSOUTH TELECOMMUNICATIONS, INC.

A handwritten signature in black ink, appearing to read "Guy M. Hicks", is written over a horizontal line.

Guy M. Hicks
333 Commerce Street, Suite 2101
Nashville, Tennessee 37201-3300
(615) 214-6301

¹ Pursuant to the Authority’s request, BellSouth will supplement its testimony to include testimony on its compliance with Section 272 and public interest. This supplemental filing, however, does not change BellSouth’s position that its application is complete as set forth in its Motion for Reconsideration.

Fred J. McCallum
Lisa Foshee
675 W. Peachtree Street, Suite 4300
Atlanta, Georgia 30375

CERTIFICATE OF SERVICE

I hereby certify that on October 2, 2001, a copy of the foregoing document was served on the parties of record, via hand delivery, facsimile, overnight or US Mail, addressed as follows:

☐ Hand
☐ Mail
☒ Facsimile
☐ Overnight

H. LaDon Baltimore, Esquire
Farrar & Bates
211 Seventh Ave. N, # 320
Nashville, TN 37219-1823
for Qwest (fka LCI), Intermedia,
KMC Telecom III and V

☐ Hand
☐ Mail
☒ Facsimile
☐ Overnight

Charles B. Welch, Esquire
Farris, Mathews, et al.
205 Capitol Blvd, #303
Nashville, TN 37219
for Time Warner and New South

☐ Hand
☐ Mail
☒ Facsimile
☐ Overnight

Henry Walker, Esquire
Boult, Cummings, et al.
P. O. Box 198062
Nashville, TN 37219-8062
for XO Communications, ICG,
ACSI (e.spire), Brooks Fiber,
SECCA and US LEC

☐ Hand
☐ Mail
☒ Facsimile
☐ Overnight

Dulaney O'Roark, Esquire
MCI WorldCom, Inc.
Six Concourse Pkwy, #3200
Atlanta, GA 30328

☐ Hand
☐ Mail
☒ Facsimile
☐ Overnight

James P. Lamoureux
AT&T
1200 Peachtree St., NE, #4068
Atlanta, GA 30367
for AT&T and TCG MidSouth

☐ Hand
☐ Mail
☒ Facsimile
☐ Overnight

Cynthia Kinser, Esquire
Consumer Advocate Division
P. O. Box 20207
Nashville, TN 37202

☐ Hand
☐ Mail
☒ Facsimile
☐ Overnight

Enrico C. Soriano
Kelley, Drye & Warren
1200 19th St., NW, #500
Washington, DC 20036
for XO Communications

☐ Hand
☐ Mail
☒ Facsimile
☐ Overnight

James Wright, Esq.
United Telephone - Southeast
14111 Capitol Blvd.
Wake Forest, NC 27587
for Sprint Communications, LP

☐ Hand
☐ Mail
☒ Facsimile
☐ Overnight

Guilford Thornton, Esquire
Stokes & Bartholomew
424 Church Street
Nashville, TN 37219
for BSLD

☐ Hand
☐ Mail
☒ Facsimile
☐ Overnight

Donald L. Scholes
Branstetter, Kilgore, et al.
227 Second Ave., N.
Nashville, TN 37219
for CWA

☒ Mail

Andrew O. Isar, Esquire
ASCENT
3220 Uddenberg Lane, NW
Gig Harbor, WA 98335
for ASCENT

☐ Hand
☐ Mail
☒ Facsimile
☐ Overnight

Jon E. Hastings, Esquire
Boult, Cummings, et al.
P. O. Box 198062
Nashville, TN 37219-8062
for MCI WorldCom

☐ Hand
☐ Mail
☒ Facsimile
☐ Overnight

Nanette S. Edwards, Esquire
ITC^DeltaCom
4092 South Memorial Parkway
Huntsville, AL 35802

☐ Hand
☐ Mail
☒ Facsimile
☐ Overnight

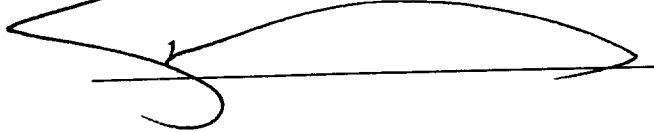
Andrew Klein, Esquire
Kelley, Drye & Warren
1200 19th St., NW
Washington, DC 20036
for KMC Telecom

☐ Hand
☐ Mail
☒ Facsimile
☐ Overnight

John McLaughlin, Jr.
KMC Telecom
1755 North Brown Road
Lawrenceville, GA 30043

☐ Hand
☐ Mail
☒ Facsimile
☐ Overnight

D. Billye Sanders, Esquire
Waller Lansden, et al.
P. O. Box 198866
Nashville, TN 37219-8966
for SBC Telecom

A handwritten signature in black ink, consisting of a large, sweeping loop followed by a horizontal line and a small flourish.